

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,

Petitioner/Judgment Creditor,

v.

Case No. 14-FJ-5-HE

AVON CAPITAL, LLC,

Respondent/Judgment Debtor,

ASSET SERVICING GROUP, LLC

Respondent/Garnishee,

SDM HOLDINGS, LLC

Respondent/Garnishee

and

AVON CAPITAL, LLC, a Wyoming
Limited Liability Company,

Intervenor.

MOTION FOR SANCTIONS AGAINST SDM HOLDINGS, LLC

Universitas Education, LLC (“Universitas”) hereby moves this Court, pursuant to the inherent power of the Court, for non-monetary sanctions against SDM Holdings, LLC (“SDM”) for its conduct in relation to the above-captioned proceeding. Throughout this litigation, SDM has engaged in a strategy to: (i) improperly prevent Universitas from collecting its judgment, and (ii) improperly increase Universitas’ attorneys’ fees so as to make it cost prohibitive for Universitas to collect its judgment.

As outlined in the accompanying Memorandum of Law, the only explanation for SDM's conduct in relation to this proceeding is the delay of garnishment through bad faith. Such bad faith conduct includes: (i) SDM's repeated refusal to appear in this proceeding, (ii) the termination of SDM's status with the Oklahoma Secretary of State in response to a garnishment summons issued by this Court, and (iii) opposing garnishment through meritless arguments. Accordingly, Universitas requests that the court enter an anti-filing injunction prohibiting SDM from filing any further motions in this proceeding without prior permission from the Court.

DATED this 31st day of March, 2021.

Respectfully submitted,

/s/ Timothy F. Campbell

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ATTORNEYS FOR UNIVERSITAS
EDUCATION, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 31th day of March, 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants on record:

John D. Stiner
Joseph H. Bocock
Alan Rupe
Gerald Green Melvin McVay
Clayton Ketter
Jeffrey Sandberg

/s/ Timothy F. Campbell